

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of Telecommunications and Energy)	
On its own Motion pursuant to G.L. c. 159, §§ 12 and 16, into the)	D.T.E. 02-8
Collocation security policies of Verizon New England Inc.)	
d/b/a Verizon Massachusetts)	
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**SPRINT’S SECOND SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England d/b/a Verizon Massachusetts (“Verizon”, “Verizon MA” or “Company”) or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

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6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response that does not provide the Sprint with the responsive documents, and requests the Sprint to inspect documents at any location is not responsive.

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13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation that supports the response provided.
15. All page and line references are to the Surrebuttal Testimony of Verizon Massachusetts dated June 18, 2002 and filed in D.T.E. 02-8.
16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to these requests by June 28, 2002.

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**SPRINT COMMUNICATIONS COMPANY L.P.'S
SECOND SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

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| SPRINT-VZ-2-1 | Please provide Verizon's 1999, 2000 and 2001 annual reports to shareholders and Verizon's 1999, 2000 and 2001 Forms 10-Q. |
| SPRINT-VZ-2-2 | Page 2, Lines 10-13: Does Verizon contend that the FCC is not adequately addressing current (post September 11, 2001) security concerns through the Homeland Security Policy Council, Network Reliability and Interoperability Council, and any other FCC dockets and/or initiatives? Please provide all relevant documents and analyses. |
| SPRINT-VZ-2-3 | Page 2, Lines 10-13: Does Verizon contend that the Department is better suited to address issues of national security than the FCC? If so, why? Please provide all relevant documents and analyses. |
| SPRINT-VZ-2-4 | Page 2, lines 18-20: Please provide all studies, analyses, documents and other support for the statement that "greater 'foot traffic' in central offices" potentially exposes the "network infrastructure" to a greater degree of risk. Please describe the "network infrastructure" to which Verizon is referring (Verizon's, CLECs', or both)? Please list, by CLLI, name and location, the Verizon MA buildings that house network facilities where there is customer "foot traffic." |
| SPRINT-VZ-2-5 | Page 3, lines 16-21: Please list and describe any specific security breaches that Verizon's proposal will eliminate? Please provide all relevant documents, studies and analyses. |
| SPRINT-VZ-2-6 | Page 4, line 2: Please quantify, by risk factor, how much each of |

Verizon's proposals will reduce "these risks", and specify each individual risk to which Verizon is referring (e.g. establishing separate entrances with separate space will reduce theft by 30%). Please provide all relevant documents, studies and analyses.

- SPRINT-VZ-2-7 Page 5, lines 4-6: Please provide all documents that support the statement that "The Department's objective is to be prepared for events that *may* occur in Massachusetts."
- SPRINT-VZ-2-8 Page 5, Lines 6-11: Please provide all documents studies and analyses that support the statement that "Limiting access to certain critical buildings and to critical areas that should not be accessed by other carriers is the most effective and efficient means 'to safeguard telecommunications networks from tampering . . .'"
- SPRINT-VZ-2-9 Page 8, lines 5-6; Page 10, Lines 1-2: Is "no change" required in existing collocated "selected, highly sensitive security risk" central offices? Please explain why or why not and provide all supporting documents and analyses.
- SPRINT-VZ-2-10 Page 11, lines 6-7: Please list, by Verizon MA central office and CLLI code, all Verizon-MA cageless collocation sites "in areas that cannot be physically separated from Verizon MA's equipment areas" where Verizon MA proposes to eliminate all cageless collocation?
- SPRINT-VZ-2-11 Page 14, lines 5-9: Please specify the exact number and location of "critical central offices as available only for virtual collocation." Please describe the criteria for selecting these "critical central offices." If the Department grants, "the last step in Verizon MA's proposed security plan," when will Verizon MA implement the plan, when and how will it determine the costs of implementing the plan, and how will Verizon apportion the costs of implementing the plan among CLECs? Please provide all relevant documents, studies and analyses.
- SPRINT-VZ-2-12 Page 14, lines 16-17: For 1997, 1998, 1999, 2000, 2001 and 2002 (year to date), please provide for each year the number of additional personnel of other carriers accessing "these locations" by Verizon MA central office, CLLI and/or other locations, and identify "these locations" as the term is used at page 14, line 17 of Verizon's surrebuttal testimony.
- SPRINT-VZ-2-13 Page 14, lines 17-19: Please provide all documents, studies and analyses that support the statement that "the increased number of additional personnel of other carriers accessing these locations

increases the opportunity or chance that inadvertent or intentional actions could harm those critical network facilities.” Please identify, by location and CLLI code, “those critical network facilities” to which Verizon MA is referring in this statement.

- SPRINT-VZ-2-14 Page 14, lines 19-20: Please provide all documents, studies and analyses that support the statement that “These critical offices require the additional degree of security that eliminating physical collocation would provide.” Please identify, by central office location and CLLI code, “these critical offices” to which Verizon MA is referring in this statement.
- SPRINT-VZ-2-15 Page 17, lines 3-6: Please list, by Verizon MA central office and CLLI code, the “limited number of central offices deemed to be ‘critical’ to overall network functionality, national security, the public safety, health, welfare and economic interest of the general public.”
- SPRINT-VZ-2-16 Page 27, lines 1-2: Please provide all documents, studies, analyses, court and regulatory decisions and citations that support the statement that “[s]ecurity and operational considerations are reasonably a part of the technical feasibility equation.”
- SPRINT-VZ-2-17 Page 27, lines 8-10: Please provide a copy and citation of the Department’s Order or ruling that “physical collocation arrangements generally should be in separated, secured space.”
- SPRINT-VZ-2-18 Page 27, lines 13-15: Please provide a copy and citation of all orders and/or rulings of the FCC, Department, courts and/or other entities that state that “the Department may under federal standards determine whether and to what extent security concerns constitute a technical feasibility limitation on physical collocation in particular cases.”
- SPRINT-VZ-2-19 Page 27, lines 16-18: Has Verizon petitioned the FCC for a waiver of the FCC’s collocation rules? If so, please provide all relevant documents, including Verizon’s waiver petition. If not, please explain why Verizon has not filed such a petition with the FCC and indicate if and when Verizon MA or any affiliate of Verizon MA plans to do so.
- SPRINT-VZ-2-20 Page 29, lines 16-18: Please provide all “cost data or other concrete evidence of harm” that demonstrates that the cost of implementing Verizon’s proposal “outweighs” any anti-competitive harm or

disruption of CLECs' access to collocation facilities.

- SPRINT-VZ-2-21 Page 30, lines 1-2: If "Verizon MA's proposed measures are intended to apply to all collocating carriers, not just CLECs, please describe how Verizon MA would apply each of its proposed security measures to Verizon MA. Please clarify, by type of carrier and specific examples, what Verizon MA means by "all collocating carriers, not just CLECs." Please provide, for each of Verizon MA's central offices in which there are collocated carriers, the square footage of the collocated space, the type of collocated carrier (ISP, CAP, IXC, CLEC, etc.), and the type of collocation arrangement(s) (e.g., expanded interconnection, floor space lease, physical collocation, virtual collocation).
- SPRINT-VZ-2-22 Page 31, lines 1-2: Please provide a copy of the provisions of Verizon MA's contract with its union pertaining to employee background checks.